

JS 44 (Rev. 06/17)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Valeant Pharmaceuticals International, Inc; Valeant Pharmaceuticals International; and AGMS, Inc.

DEFENDANTS

AIG Insurance Company of Canada, et al. (see attachment)

(b) County of Residence of First Listed Plaintiff **Foreign (2d is Somerset)**
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant **Foreign**
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) Attorneys (Firm Name, Address, and Telephone Number)
See Attachment

Attorneys (If Known)
See Attachment

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question
(U.S. Government Not a Party)
- ☒ 4 Diversity
(Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|---------------------------------------|---|---------------------------------------|---------------------------------------|
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input checked="" type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input checked="" type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input checked="" type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input checked="" type="checkbox"/> 3 | <input checked="" type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input checked="" type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS---Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☐ 1 Original Proceeding ☒ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
28 USC 1332(a) - diversity

Brief description of cause:

Declaratory judgement and alleged breach of contract with commercial insurers

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE Shipp

DOCKET NUMBER 3:15-cv-07658-MAS-LHG

DATE

01/12/2018

SIGNATURE OF ATTORNEY OF RECORD

Robert A. Benjamin

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

Party	
VALEANT PHARMACEUTICALS INTERNATIONAL, INC	<p>Gita F. Rothschild Sherilyn Pastor McCarter & English LLP 100 Mulberry Street Newark, NJ 07102 973.622.4444</p> <p>John E. Failla Nathan Lander Seth B. Schaffer Proskauer Rose LLP 11 Times Square New York, New York 10036 212.969.3141</p>
VALEANT PHARMACEUTICALS INTERNATIONAL	<p>Gita F. Rothschild Sherilyn Pastor McCarter & English LLP 100 Mulberry Street Newark, NJ 07102 973.622.4444</p> <p>John E. Failla Nathan Lander Seth B. Schaffer Proskauer Rose LLP 11 Times Square New York, New York 10036 212.969.3141</p>
AGMS, INC.	<p>Gita F. Rothschild Sherilyn Pastor McCarter & English LLP 100 Mulberry Street Newark, NJ 07102 973.622.4444</p> <p>John E. Failla Nathan Lander Seth B. Schaffer Proskauer Rose LLP 11 Times Square New York, New York 10036 212.969.3141</p>
AIG INSURANCE COMPANY OF CANADA	<p>Jamieson Halfnight Lerners LLP 130 Adelaide Street West, Suite 2400 Toronto Ontario M5H 3P5 416.361.3083</p> <p>Luke Lynch, Jr. Frances Buckley D'Amato & Lynch LLP 225 Liberty Street New York, New York 10281 212.909.2010</p> <p>Timothy M. Donohue Arleo & Donohue 622 Eagle Rock Ave West Orange, New Jersey 07052 973-736-8660</p>

Party	
ACE INA INSURANCE COMPANY	David A. Wilford Christopher Conrad Sabina Danek Wilford Conrad LLP 18 East Dundee Road Building 6, Suite 150 Barrington, Illinois 60010 224.848.4722 Sean X. Kelly Sean Robins Melissa Brown Marks, O'Neill, O'Brien, Doherty & Kelly, PC 535 Route 38 East, Suite 501 Cherry Hill, New Jersey 08002 856.663.4300
ALLIANZ GLOBAL RISKS US INSURANCE COMPANY	Kevin T. Coughlin Suzanne C. Midlige Sally A. Clements Coughlin Duffy LLP 350 Mount Kemble Avenue Morristown, New Jersey 07962 973-267-0058
ARCH INSURANCE CANADA LTD	Richard Provost Langlois 1250 Boul Rene-Levesque Montreal Quebec H3B 4W8 514.788.8828
EVEREST INSURANCE COMPANY OF CANADA	Joseph J. Schiavone Budd Lerner, P.C. 150 John F. Kennedy Parkway Short Hills, New Jersey 07078-2703 973.315.4407
HARTFORD FIRE INSURANCE COMPANY	Robert A. Benjamin Patrick Stoltz Kaufman Borgeest & Ryan LLP 200 Summit Lake Drive, 1st Floor Valhalla, New York 10595 914.449.1000
IRONSHORE CANADA LTD	David Wilson Blaney McMurtry LLP 2 Queen Street East, Suite 1500 Toronto Ontario M5C 3G5 416.593.3970
LIBERTY INTERNATIONAL UNDERWRITERS, a division of LIBERTY MUTUAL INSURANCE COMPNAY; and LIBERTY MUTUAL INSURANCE COMPANY	David A. Wilford Christopher Conrad Sabina Danek Wilford Conrad LLP 18 East Dundee Road Building 6, Suite 150 Barrington, Illinois 60010 224.848.4722 Sean X. Kelly Sean Robins Melissa Brown Marks, O'Neill, O'Brien, Doherty & Kelly, PC 535 Route 38 East, Suite 501 Cherry Hill, New Jersey 08002 856.663.4300
LLOYD'S UNDERWRITERS	

Party	
LLOYD'S CONSORTIUM 9885 (a/k/a STARR FINANCIAL LINES CONSORTIUM 9885)	<p>David A. Wilford Christopher Conrad Sabina Danek Wilford Conrad LLP 18 East Dundee Road Building 6, Suite 150 Barrington, Illinois 60010 224.848.4722</p> <p>Sean X. Kelly Sean Robins Melissa Brown Marks, O'Neill, O'Brien, Doherty & Kelly, PC 535 Route 38 East, Suite 501 Cherry Hill, New Jersey 08002 856.663.4300</p>
LLOYD'S SYNDICATE ANV 1861	<p>David A. Wilford Christopher Conrad Sabina Danek Wilford Conrad LLP 18 East Dundee Road Building 6, Suite 150 Barrington, Illinois 60010 224.848.4722</p> <p>Sean X. Kelly Sean Robins Melissa Brown Marks, O'Neill, O'Brien, Doherty & Kelly, PC 535 Route 38 East, Suite 501 Cherry Hill, New Jersey 08002 856.663.4300</p>
LLOYD'S SYNDICATE AMA 1200	<p>David A. Wilford Christopher Conrad Sabina Danek Wilford Conrad LLP 18 East Dundee Road Building 6, Suite 150 Barrington, Illinois 60010 224.848.4722</p> <p>Sean X. Kelly Sean Robins Melissa Brown Marks, O'Neill, O'Brien, Doherty & Kelly, PC 535 Route 38 East, Suite 501 Cherry Hill, New Jersey 08002 856.663.4300</p>

Party	
LLOYD'S SYNDICATE ARGO 1200	<p>David A. Wilford Christopher Conrad Sabina Danek Wilford Conrad LLP 18 East Dundee Road Building 6, Suite 150 Barrington, Illinois 60010 224.848.4722</p> <p>Sean X. Kelly Sean Robins Marks, O'Neill, O'Brien, Doherty & Kelly, PC 535 Route 38 East, Suite 501 Cherry Hill, New Jersey 08002 856.663.4300</p>
LLOYD'S SYNDICATE AWH 2232	<p>Roderic McLaughlan Barry Stork Clyde & Co 401 Bay Street, Suite 2500 Toronto Ontario M5H 2Y4 416.366.4555</p>
LLOYD'S SYNDICATE BRT 2987	<p>Roderic McLaughlan Barry Stork Clyde & Co 401 Bay Street, Suite 2500 Toronto Ontario M5H 2Y4 416.366.4555</p>
LLOYD'S SYNDICATE CVS 1919	<p>David A. Wilford Christopher Conrad Sabina Danek Wilford Conrad LLP 18 East Dundee Road Building 6, Suite 150 Barrington, Illinois 60010 224.848.4722</p> <p>Sean X. Kelly Sean Robins Melissa Brown Marks, O'Neill, O'Brien, Doherty & Kelly, PC 535 Route 38 East, Suite 501 Cherry Hill, New Jersey 08002 856.663.4300</p>
LLOYD'S SYNDICATE HCC 4141	<p>Roderic McLaughlan Barry Stork Clyde & Co 401 Bay Street, Suite 2500 Toronto Ontario M5H 2Y4 416.366.4555</p>

Party	
LLOYD'S SYNDICATE MITSUI 3210	<p>David A. Wilford Christopher Conrad Sabina Danek Wilford Conrad LLP 18 East Dundee Road Building 6, Suite 150 Barrington, Illinois 60010 224.848.4722</p> <p>Sean X. Kelly Sean Robins Melissa Brown Marks, O'Neill, O'Brien, Doherty & Kelly, PC 535 Route 38 East, Suite 501 Cherry Hill, New Jersey 08002 856.663.4300</p>
LLOYD'S SYNDICATE MIT 3210	<p>David A. Wilford Christopher Conrad Sabina Danek Wilford Conrad LLP 18 East Dundee Road Building 6, Suite 150 Barrington, Illinois 60010 224.848.4722</p> <p>Sean X. Kelly Sean Robins Melissa Brown Marks, O'Neill, O'Brien, Doherty & Kelly, PC 535 Route 38 East, Suite 501 Cherry Hill, New Jersey 08002 856.663.4300</p>
LLOYD'S SYNDICATE NAV 1221	<p>Roderic McLaughlan Barry Stork Clyde & Co 401 Bay Street, Suite 2500 Toronto Ontario M5H 2Y4 416.366.4555</p>
LLOYD'S SYNDICATE QBE 1886	<p>David A. Wilford Christopher Conrad Sabina Danek Wilford Conrad LLP 18 East Dundee Road Building 6, Suite 150 Barrington, Illinois 60010 224.848.4722</p> <p>Sean X. Kelly Sean Robins Melissa Brown Marks, O'Neill, O'Brien, Doherty & Kelly, PC 535 Route 38 East, Suite 501 Cherry Hill, New Jersey 08002 856.663.4300</p>
LLOYD'S SYNDICATE SJC 2003	<p>James A. Skarzynski Alexis J. Rogoski George W. Mustes Skarzynski Black LLC One Battery Park Plaza, 32nd Floor New York, New York 10004 212.820.7720</p>

Party	
ROYAL & SUN ALLIANCE INSUANCE COMPANY OF CANADA	<p>David A. Wilford Christopher Conrad Sabina Danek Wilford Conrad LLP 18 East Dundee Road Building 6, Suite 150 Barrington, Illinois 60010 224.848.4722</p> <p>Sean X. Kelly Sean Robins Marks, O'Neill, O'Brien, Doherty & Kelly, PC 535 Route 38 East, Suite 501 Cherry Hill, New Jersey 08002 856.663.4300</p>
TEMPLE INSURANCE COMPANY	<p>Joseph Finnerty III John Vukelj Steven Rosato DLA Piper 1251 Avenue of the Americas New York, New York 10020-1104 212.335.4800</p>
XL INSURANCE COMPANY SE	<p>James A. Skarzynski Alexis J. Rogoski George W. Mustes Skarzynski Black LLC One Battery Park Plaza, 32nd Floor New York, New York 10004 212.820.7720</p>

KAUFMAN BORGEEST & RYAN LLP
Robert A. Benjamin
Patrick Stoltz
200 Summit Lake Drive
Valhalla, New York 10595
Telephone: 914.449.1000
Facsimile: 914.449.1100
rbenjamin@kbrlaw.com

Attorneys for Hartford Fire Insurance Company

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

-----X	
VALEANT PHARMACEUTICALS	:
INTERNATIONAL, INC.; VALEANT	:
PHARMACEUTICALS INTERNATIONAL; and	:
AGMS, INC.	:
	:
Plaintiffs,	:
	:
v.	:
	:
AIG INSURANCE COMPANY OF CANADA;	:
ACE INA INSURANCE COMPANY; ALLIANZ	:
GLOBAL RISKS US INSURANCE COMPANY;	:
ARCH INSURANCE CANADA LTD; EVEREST	:
INSURANCE COMPANY OF CANADA;	:
HARTFORD FIRE INSURANCE COMPANY;	:
IRONSHORE CANADA LTD; LIBERTY	:
INTERNATIONAL UNDERWRITERS, a division	:
of LIBERTY MUTUAL INSURANCE	:
COMPANY; and LIBERTY MUTUAL	:
INSURANCE COMPANY; LLOYD'S	:
UNDERWRITERS; LLOYD'S CONSORTIUM	:
9885 (a/k/a STARR FINANCIAL LINES	:
CONSORTIUM 9885); LLOYD'S SYNDICATE	:
ANV 1861; LLOYD'S SYNDICATE AMA 1200;	:
LLOYD'S SYNDICATE ARGO 1200; LLOYD'S	:
SYNDICATE AWH 2232; LLOYD'S	:
SYNDICATE BRT 2987; LLOYD'S SYNDICATE:	:
CVS 1919; LLOYD'S SYNDICATE HCC 4141;	:
LLOYD'S SYNDICATE MITSUI 3210;	:
LLOYD'S SYNDICATE MIT 3210; LLOYD'S	:
SYNDICATE NAV 1221; LLOYD'S	:
SYNDICATE QBE 1886; LLOYD'S	:

Civil Action. No:

NOTICE OF REMOVAL

SYNDICATE SJC 2003; ROYAL & SUN :
ALLIANCE INSURANCE COMPANY OF :
CANADA; TEMPLE INSURANCE COMPANY :
and XL INSURANCE COMPANY SE., :
:

Defendants. :
-----X

Defendant Hartford Fire Insurance Company (“Hartford”) by and through its undersigned attorneys respectfully asserts:

1. Plaintiffs Valeant Pharmaceuticals International, Inc. (“Valeant CA”), Valeant Pharmaceuticals International (“Valeant US”), and AGMS, Inc. (“AGMS”) (Valeant CA, Valeant US, and AGMS, collectively the “Valeant Parties”) commenced this action on December 7, 2017, by filing a Complaint in the Superior Court of New Jersey, Law Division, Somerset County, captioned *Valeant Pharmaceuticals International, Inc., et al. v. AIG Insurance Company of Canada, et al.*, Docket number 1483-17. The action is pending in that court.

2. On January 3, 2018, the Valeant Parties effected service of the Summons and Complaint on Hartford.

3. Upon information and belief, on or around January 3, 2018, the Valeant Parties have effected service of the Summons and Complaint on many or all defendants.

4. Copy of the Summons and Complaint, which constitutes all of the processes and pleadings to date, is annexed hereto as Exhibit A.

5. This Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1332(a), and this action may be removed by Hartford pursuant to the provisions of 28 U.S.C. § 1441(a) because it is a civil action wherein: (1) complete diversity of citizenship

exists among the parties; and (2) the amount in controversy exceeds \$75,000.00, exclusive of interest and costs.

6. Pursuant to 28 U.S.C. § 1446(b)(2)(A), upon information and belief, all defendants who have been properly served consent to removal. See Declaration of Robert A. Benjamin, at Exhibit B.

7. As alleged in the attached Complaint, the Valeant Parties are Canadian and Delaware corporations with their principal places of business in Canada or New Jersey. As alleged in the attached Complaint, and upon information and belief, none of the defendants is incorporated or has a principal place of business in Delaware or New Jersey. Accordingly, complete diversity of citizenship exists among the parties.

8. As alleged in the attached Complaint, the Valeant Parties seek insurance coverage under insurance policies representing over \$300 million in limits of liability, although each insurance policy represents a several contract. The underlying litigation for which the Valeant Parties seek insurance coverage seeks hundreds of millions, possibly billions, of dollars in damages. Certain of the underlying litigation for which the Valeant Parties seek insurance coverage in this Complaint is the subject of a putative settlement that would require the Valeant Parties to pay \$96.25 million. Accordingly, the amount in controversy exceeds \$75,000.00, exclusive of interest and costs.

9. This Notice of Removal is filed within the time provided by 28 U.S.C. § 1446(b) and the Federal Rules of Civil Procedure.

10. Pursuant to L.Civ.R. 201.1(d)(3), the undersigned counsel certifies that the amount in controversy in the attached Complaint exceeds \$150,000.00, exclusive of interest and costs and any claim for punitive damages.

11. Upon filing this Notice of Removal, Hartford will give written notice thereof to all counsel listed on Exhibit C. Finally, Hartford will file copies of said Notice of Removal with the Clerk, Superior Court of New Jersey, Law Division, Somerset County, Somerville, New Jersey.

12. By indicating their consent to the removal of this action, none of the defendants waive any defenses or claims that may be available to each.

13. By filing this Notice of Removal, Hartford does not waive any defenses or claims that may be available to it.

WHEREFORE, Hartford removes the above captioned action now pending in the Superior Court of New Jersey, Law Division, Somerset County, to the United States District Court for the District of New Jersey, wherein it shall proceed as an action originally commenced therein.

Dated: January 12, 2018



Robert A. Benjamin
Patrick Stoltz
KAUFMAN BORGEESE & RYAN LLP
200 Summit Lake Drive
Valhalla, New York 10595
Telephone: 914.449.1000
Facsimile: 914.449.1100
rbenjamin@kbrlaw.com

Attorneys for Hartford Fire Insurance Company

DECLARATION OF SERVICE

STATE OF NEW YORK)
) s.s.:
COUNTY OF WESTCHESTER)

1. ROBERT A. BENJAMIN, the undersigned deposes and says: I am over 18 years of age, am not a party in the above-captioned case, and am a partner with the firm Kaufman Borgeest & Ryan LLP.

2. On January 12, 2018, I caused to be served a true and correct copy of the following documents via electronic mail and US. Mail on all parties listed on Exhibit C, referenced herein:

- Hartford Fire Insurance Company Notice of Removal, including
 - Exhibit A – Copy of Summons and Complaint;
 - Exhibit B – Declaration of Robert A. Benjamin; and
 - Exhibit C – Service List.

Dated: Valhalla, New York
January 12, 2018



ROBERT A. BENJAMIN

KAUFMAN BORGEEST & RYAN LLP
200 Summit Lake Drive
Valhalla, New York 10595
(914) 449.1059 (Telephone)
(914) 449-1000 (Facsimile)
rbenjamin@kbrlaw.com